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R 042105Z AUG 01
FM COGARD MSO DETROIT MI
TO CCGDNINE CLEVELAND OH//CC/M//
INFO COMDT COGARD WASHINGTON DC//G-MOR/G-OPF//
COMLANTAREA COGARD PORTSMOUTH VA//AM/ACC//
COGARD NATIONAL RESPONSE CENTER WASHINGTON DC
COGARD NSFCC ELIZABETH CITY NC
COGARD AST FORT DIX NJ
COMCOGARDGRU DETROIT MI
COGARD AIRSTA DETROIT MI
COMCOGARD NPFC WASHINGTON DC
COGARD FINCEN CHESAPEAKE VA//ORGQ//
COMCOGARD MLC LANT NORFOLK VA//FCP-2//
HQ EPA WASHINGTON DC
US EPA REGION V CHICAGO
COGARD STA BELLE ISLE MI
COGARD MSO TOLEDO OH
BT

US EPA RECORDS CENTER REGION 5



406664

UNCLAS //N16465// VOL. CCN
OPER/ATOFINA CHEMICAL PLANT HAZMAT RELEASE//
MSGID/SITREP-POL/COGARD MSO DETROIT MI/-//
SUBJ/SITREP-POL (FIVE)/ACTUAL MAJOR, METHYL MERCAPTAN AND CHLORINE
RELEASE, RAIL CAR FIRE, ADJACENT TO TRENTON CHANNEL, RIVERVIEW, MI, MC
01008815, CPN C01124//
REF/A/MSG/MY/012217Z AUG 01//
REF/B/MSG/MY/152241Z JUL 01//
NARR/REF A IS SITREP-POL FOUR. REF B IS SITREP-POL ONE.//
RMKS/1. SITUATION.

A. OVERVIEW: SITUATION WINDING DOWN. RAIL TANK CAR FIRE
EXTINGUISHED, LIQUID CHLORINE (EXCEPT RESIDUE) SAFELY OFFLOADED FROM
RAIL CAR THAT SUFFERED SOME HEAT DAMAGE TO RUNNING GEAR AND 2 HOSES.
CONFIDENCE IN THE INTEGRITY OF CL CAR INCREASED AFTER VALVES
FUNCTIONED NORMALLY (AND CAR HELD PRESSURE) DURING XFER OPS. UNKNOWN
QUANTITY OF PRODUCT REMAINS IN HEAVILY DAMAGED METHYL MERCAPTAN CAR. 3
OF 5 CARS IN IMMEDIATE AREA NOT DAMAGED AT ALL. EFFORTS NOW FOCUS ON
PURGING CHLORINE RAIL CAR AND PLANNING TO PURGE METHYL MERCAPTAN CAR.

B. O/S WX: WINDS ENE 5 KTS, 90F, SUNNY, 8NM VIS. WX DURING
OVERNIGHT TRANSFER OPERATION: WINDS ENE 4 KTS, 65F, NIGHT ILLUMINATED
WITH FACILITY S NORMAL LIGHTS.

C. FACILITY DATA: ATOFINA CHEMICAL PLANT, 17168 WEST JEFFERSON,
RIVERVIEW, MI 48219.

D. SAR STATUS: NO ONGOING COAST GUARD SAR ACTIVITY.

E. COAST GUARD RESOURCES SUMMARY: MSO DETROIT AND 5 AST MBRS O/S
01, 02, AND 03-04 AUG. VARIOUS UNITS AND STAFF ELEMENTS CONSULTED
WITH.

F. RESOURCES AT RISK: NO ENVIRONMENTAL OR HISTORIC RESOURCES ARE
KNOWN TO BE AT RISK.

G. ECONOMIC IMPACT: ATOFINA PLANT IS TEMPORARILY SHUT DOWN FOR

R 042105Z AUG 01 COGARD MSO DETROIT MI

Page 1 of

UNCLASSIFIED

Roos, John LTJG/ESUCLEVELAND

UNCLASSIFIED

BUSINESS. PLANT STILL ABLE TO MEET CONTRACTUAL OBLIGATIONS USING WORK-AROUNDS TO KEEP DELIVERING CHEMICAL PRODUCTS TO CUSTOMERS. CITIZENS FROM GROSSE ILE ARE REPORTEDLY ENTERING CLASS-ACTION LAW SUITS AGAINST COMPANY.

H. KEY STAKEHOLDER ISSUES: ENSURING THE SAFETY OF WORKERS IS TOP PRIORITY. AIR MONITORING CONTINUES, NOW BEING PROVIDED BY CENTER FOR TOXICOLOGY AND ENVIRONMENTAL HEALTH, LLC (CTEH), CONTRACTOR PAID BY ATOFINA. NO CHLORINE DETECTED, NOR VOC S DETECTED ABOVE BACKGROUND AT ANY TIME DURING LIQUID TRANSFER OPERATION BY PERSONAL ALARMS, PERIMETER MONITORING AND SAMPLING, OR COMMUNITY AIR MONITORING AND SAMPLING.

I. HEALTH AND HUMAN SAFETY FACTORS: NO RELEASE OF HAZMAT IS TAKING PLACE. RISKS ASSOCIATED WITH TRANSFER OPERATION MITIGATED WITH PPE IAW APPROVED SITE SAFETY PLAN.

J. MEDIA INTEREST: MODERATE LOCAL INTEREST.

K. CASUALTY INFORMATION: AS DESCRIBED IN REF A. INVESTIGATIONS BY NTSB, MI OSHA, AND ATOFINA PEND. CLEANUP OPS WILL ASSIST INVESTIGATIONS BY ALLOWING EXAMINATION OF THE "DOME" OF AFFECTED CARS.

L. INCIDENT/UNIFIED COMMAND STATUS: COMMAND POST AT ATOFINA CHEMICAL PLANT STAFFED BY PRP, RIVERVIEW FIRE DEPARTMENT, MSO DETROIT, AST, WAYNE CO. PUBLIC HEALTH, AND CONTRACTED RESPONSE PERSONNEL AS NECESSARY.

2. ACTIONS TAKEN.

A. 011755Q AUG 01: RCVD DRAFT SITE SAFETY PLAN, COMMENCED REVIEW PER REF A.

B. 2100: AST ARRIVED IN AREA, CONFERRED WITH MSO DETROIT.

C. 2230: MSO FAXED CORRESPONDENCE TO PRP DIRECTING REVISIONS TO SITE SAFETY PLAN (SSP) TO MEET OSHA HAZWOPER REGS PER 29 CFR 1910.120(Q).

D. 021000Q AUG 01: RIVERVIEW FIRE CHIEF BRIEFED AREA PUBLIC SAFETY AGENCIES ON PLANNED XFER OPS.

E. 1255: MSO CONFERRED WITH CHLORINE INSTITUTE, USCG G-MOR-2 AND AST REGARDING ACTION PLAN AND SITE SAFETY PLAN.

F. 1300: EXECUTION OF CHLORINE RAIL CAR CLEANING, PURGING AND REMOVAL PLAN (ACTION PLAN) DISCUSSED IN REF A WAS DELAYED UNTIL 03 AUG DUE TO LATE ARRIVAL OF RECEIVING RAIL CAR.

G. 1624 AUG 01: MSO, SRS, CTEH, PRP MEET TO DISCUSS SSP. INDUSTRY AGREED TO MAKE ALL CHANGES DIRECTED BY MSO. CTEH HAD ALREADY MET WITH LOCAL HOSPITALS TO PREPARE THEM FOR REMOTE POSSIBILITY OF CONTAMINATED VICTIMS.

H. 031015Q AUG 01: RVCD LTR FAXED FM PRP DISPUTING MSO DECISION TO REQUIRE CONFORMANCE TO OSHA HAZWOPER STANDARD.

I. 1300: RECEIVED NEW DRAFT SITE SAFETY PLAN.

J. 1500: EPA PLACED 2 OSC S AND 6 CONTRACT PERSONNEL ON HEIGHTENED ALERT STATUS (AT NO COST) FOR AIR MONITORING OR OTHER SUPPORT DUTIES IF NEEDED.

K. 1515: SRS BEGINS RIGGING TO TRANSFER LIQUID CHORINE.

L. 1600: FINAL WRITTEN COMMENTS ON SSP SENT TO PRP; SSP REVISED.

R 042105Z AUG 01 COGARD MSO DETROIT MI

Page 2 of 4

UNCLASSIFIED

Roos, John LTJG/ESUCLEVELAND

UNCLASSIFIED

M. 1630: AST O/S.

N. 1645: DETAILED SAFETY BRIEF HELD FOR ALL PERSONNEL O/S, USING APPROVED SSP. OTHERS ARRIVING LATER BRIEFED INDIVIDUALLY.

O. 1740: MSO REP O/S.

P. 1745: MSO FAXES LTR TO PRP CHARACTERIZING SITE AS POST-EMERGENCY PHASE AND INFORMS PRP THAT THEY MUST FOLLOW 29 CFR 1910.120(B) THROUGH (O).

Q. 2030: TRANSFER HARDWARE (INCLUDING ALL 26 CONNECTIONS) PASSES LEAK TEST (USING NITROGEN) AT 160 PSI.

R. 2046: CLOSED-LOOP TRANSFER OF CL FROM DAMAGED CAR TO RCVG CAR STARTS. INITIAL PRESSURE 110 PSI IN DAMAGED CAR/-1 PSI IN RCVG CAR. AS EXPECTED, PRESSURES GRADUALLY GO DOWN/UP, RESPECTIVELY.

S. 2056: SMALL LEAK OF CL OCCURRED THROUGH PACKING OF ONE VALVE. LEAK STOPPED AS VALVE WAS FULLY OPENED.

T. 2245: AST MAKES ENTRY. ALL SAT.

U. 2306: PER ACTION PLAN, COMPRESSOR BROUGHT O/L TO EVACUATE VAPORS FM RCVG CAR AND INCREASE PRESSURE IN DAMAGED CAR, TO OPTIMIZE LIQUID CL FLOW RATE.

V. 040136Q AUG 01: BATTERIES REPLACED AT ALL REMOTELY OPERATED AIR MONITORS; ALL ARE RECALIBRATED.

W. 0938: BRFD EPA ON OVERNIGHT EVENTS AND FUTURE PLANS.

X. 0942: LIQUID TRANSFER COMPLETED. EPA CONTRACTORS TAKEN OFF STANDBY. COMMENCED PURGING LIQUID TRANSFER LINES INTO RCVG CAR.

Y. 0955: AST RELEASED AND DEPARTED SCENE.

Z. 1040: ALL TRANSFER HARDWARE DISCONNECTED. RCVG CAR IS READY FOR TRANSPORTATION BY RAIL AT ATOFINA S DISCRETION. TRENTON FD ADVANCED LIFE SUPPORT RELEASED. AIR MONITORING SUSPENDED.

AA. 041140Q AUG 01: MSO REP DEPARTED SCENE.

AB. 1750: PHONCON NPFC DUTY OFFICER CONFIRMED THAT CERCLA HAS INCREASED THE CEILING TO \$50,000.

3. ADDITIONAL INFO.

A. CPN INFO: CPN C01124.

B. CPN CEILING \$50,000. EXPENDED: CG COSTS \$37,532.38, CONTRACTOR COSTS BORNE BY PRP.

4. FUTURE PLANS AND RECOMMENDATIONS.

A. 041700Q AUG 01: AFTER TODAY'S CREW REST PERIOD WHILE ATOFINA WORKERS SET UP PORTABLE SCRUBBER, SRS TO COMMENCE HOOKUP TO PURGE REMAINING CHLORINE FM DAMAGED CAR. RESUME AIR MONITORING. AIR WILL BE PUSHED INTO CAR AND VAPORS WILL BE SPARGED INTO PORTABLE SCRUBBER PER APPROVED ACTION PLAN. WHEN CL VAPORS ENTERING SCRUBBER COME DOWN TO 1 PPM, CAR WILL BE VENTILATED TO ATMOSPHERE FOR AT LEAST 10 AIR CHANGES. ATMOSPHERIC CONCENTRATION OF CL NOT EXPECTED TO BE DETECTABLE. DOME TO BE REMOVED AND TURNED OVER TO INVESTIGATORS. CHAIN OF CUSTODY TO BE MAINTAINED. EXPECT SRS TO PROVIDE DOCUMENTATION CERTIFYING THAT CAR IS SAFE FOR SCRAPPING. OPERATION EXPECTED TO LAST UNTIL 06 AUG.

B. CONTINUE TO MONITOR SITUATION AND OVERSEE OPERATIONS PERIODICALLY AS NEEDED.

C. AWAIT INFORMATION ON STATUS OF MERCAPTAN CAR. RE-EVALUATE

Roos, John LTJG/ESUCLEVELAND

UNCLASSIFIED

THREAT BASED UPON FINDINGS.

D. CO'S COMMENTS/RECOMMENDATIONS: PUBLIC INTEREST MODERATING, BUT OCCASIONALLY SIGNIFICANT. CL VAPOR PURGING IS A MORE ROUTINE OPERATION AND POSES LESS OF A RISK THAN THE LIQUID CL OFFLOAD COMPLETED TODAY. MSO WILL TRACK LOCALLY WITH GROSSE ILE EPA OFFICE. NEXT REPORT UPON SIGNIFICATE CHANGE.

E. CASE PENDS.//

BT
NNNN